

EXHIBIT F

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

cc: RGS
MLS

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

January 27, 1998

CERTIFIED MAIL: P 404 640 340

Mr. Anthony C. Sullivan, Esquire
Barnes & Thornburg
11 South Meridian Street
Indianapolis, IN 46204

Post-it* Fax Note	7671	Date	# of pages
To	GORDON HURST	From	PAUL
Co./Dept.	SIGECO	Co.	DUBENET
Phone #	812-464-4616	Phone #	
Fax #	812-465-4114	Fax #	

Subject: SIGECO's replacement of turbine blades and steam tubes for purposes of Prevention of Significant Deterioration and New Source Performance Standards

Dear Mr. Sullivan:

IDEM has reviewed the request submitted July 14, 1997, and renewal request submitted August 22, 1997 on behalf of Southern Indiana Gas & Electric Company (SIGECO) for the replacement of steam tubes and turbine blades to be conducted on Culley Unit 3. IDEM has determined that these activities will not trigger Clean Air Act requirements under the prevention of significant deterioration (PSD) nor the new source performance standards (NSPS) programs. Additionally, we have reviewed supplemental data provided by SIGECO on November 5, 1997.

Based on the data presented, we concur with SIGECO that the maintenance activities proposed for Culley Unit 3 will not trigger the requirements under NSPS or PSD. Specifically, we have determined that the replacement of the existing steam tubes and turbine blades can be considered a "like-kind replacement" under 326 IAC 2-2-1 for purposes of PSD. Additionally, this activity by SIGECO falls under the "maintenance, repair, and replacement" exemption for 326 IAC 12-1 for NSPS.

Thank you for your thoroughness in this matter. No permit review is necessary at this time for either prevention of significant deterioration or new source performance standards. If you have any additional concerns, please feel free to contact Nisha Sizemore at (317) 232-8356.

Sincerely,

Felicia George
Assistant Commissioner
Office of Air Management

cc: Nisha Sizemore, OAM
cc: Paul Dubenetzky, OAM
cc: Jody Harney, OLC

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